JASON M. FRIERSON 1 United States Attorney 2 District of Nevada Nevada Bar Number 7709 3 SKYLER H. PEARSON Assistant United States Attorney 501 Las Vegas Blvd. So., Suite 1100 5 Las Vegas, Nevada 89101 (702) 388-6336 skyler.pearson@usdoj.gov 6 7 Attorneys for the United States 8 UNITED STATES DISTRICT COURT 9 **DISTRICT OF NEVADA** 10 Case No. 2:22-cv-00169-APG-BNW 11 Manichanh Sitivong, Stipulation and Order to Extend Time 12 Plaintiff, for the United States to Respond to 13 Plaintiff's Motion for Protective Order v. (ECF No. 50) 14 United States of America; DOES I through X, inclusive; ROE BUSINESS ENTITIES, I (First Request) 15 through X, inclusive, 16 Defendants. 17 18 Plaintiff, Manichanh Sitivong, and Defendant, United States of America, through 19 counsel, hereby stipulate and request that the deadline for the United States to respond to 20 Plaintiff's Motion for Protective Order Regarding Mark Kabins, M.D.'s Deposition (ECF 21 No. 50) be extended seven (7) days to **June 13, 2023**. Plaintiff's reply would thus be due on 22 June 20, 2023. 23 The parties request the extension based on the following: since the filing of the 24 motion, the parties have continued to work towards a possible resolution that might not 25 require the Court's intervention. However, additional time is needed to allow Plaintiff to 26 work with Dr. Kabins regarding the possible solution. The additional time sought by the 27 parties may resolve the issues put forth in the motion. 28

1 Accordingly, it is requested, stipulated, and agreed that Defendant's response to 2 Plaintiff's motion be extended seven days to June 13, 2023. Plaintiff's reply to be filed June 3 20, 2023. 4 Respectfully submitted this 6th day of June 2023. 5 DENNIS M. PRINCE JASON M. FRIERSON United States Attorney Nevada Bar No. 5092 6 ANDREW R. BROWN /s/ Skyler Pearson Nevada Bar No. 15785 SKYLER H. PEARSON PRINCE LAW GROUP Assistant United States Attorney 8 10801 W. Charleston Blvd., Attorneys for the United States Suite 560 Las Vegas, Nevada 89135 -And-10 CHAD M. GOLIGHTLY LAW OFFICE OF CHAD M. 11 GOLIGHTLY, LTD. 12 8560 S. Eastern Ave., Suite 240 Las Vegas, NV 89123 13 /s/ Andrew R. Brown 14 ANDREW R. BROWN Attorneys for Plaintiff 15 16 IT IS SO ORDERED: 17 UNITED STATES MAGISTRATE JUDGE 18 19 **DATED:** June 6, 2023 20 21 22 23 24 25 26 27 28